

## Clark County Environmental Impact Scoping in regards to Comprehensive Plan

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**INDEX #1: Commentary from EIS Scoping Meeting held on October 18, 2005.  
Transcribed by Cindy Holley, Rider & Associates, Inc.**

MARLIA JENKINS: Well, welcome, we're glad you're here this evening. On behalf of the County Board of Commissioners, our Chair, Betty Sue Morris, our County Administrator, Bill Barron, the Community Development Department, our Director, Rich Carson and the rest of the Long-Range Planning staff I'd like to welcome you to this meeting on EIS scoping. I'm Marlia Jenkins, I'm the acting coordinator of the EIS process. We're really glad to see you here because we know it does take time out of your schedule, it's something that isn't given easily and we appreciate that you would take it to come to talk to us about the Environmental Impact Statement.

Everyone here we know is really concerned about the way our community grows. Our concern brings us here in this one location and I hope tonight that our mutual concern for this beautiful Clark County will draw us together even though we may have differences of opinion, which I expect that we will, or see problems that need to be solved. Our differences of opinion can give us the opportunity to learn about what matters to other people. It's an opportunity to get out of ourselves and into an understanding of the needs of other people that we may not get to talk to very often. So if you're standing at a table and you hear someone say something that to you is totally outrageous, I'd encourage you to take a few moments and ask them why do you think that, what has led you to believe what you believe, ask them a few questions.

The problems that we may expose or talk about tonight give us the opportunity to also think about solutions, how can we grow in a way that benefits as many of our citizens and the environment as possible. Most of us like to solve problems, we find that to be fun, so identification of a problem isn't necessarily a mark of gloom and doom, it can be an exciting opportunity to put our thinking caps on to see how we can solve some problems. Our purpose tonight is to get your input on the scope of the issues the County should include in the preparation of an Environmental Impact Statement. The Environmental Impact Statement or EIS is being prepared for the revision of the County comprehensive plan and the County uses the requirements of the State Environmental Policy Act to guide the preparation of the EIS.

Now the scoping, which is what we're going to be doing here tonight, is the first formal step in the preparation of an EIS. In scoping we try to look at the environmental issues in a particular geographic area and we ask ourselves and as many people as we can find what are the issues that might be important to the environment. For the revised plan the geographic area that we're scoping is what we call the maximum study area. Now in the pamphlet, the colored pamphlet that you picked up when you came through the door, we have a map of the maximum study area and its description and that description and map are on Pages 2 and 3, and what we're asking you to do here tonight is look at the area within the maximum study area and identify issues the County should consider for study. You can also talk about solutions or mitigation factors if those come to your mind too.

Now Table 1 has a larger map for you to review and Bob Higbie will be answering any questions, and that's Bob back there in the corner and he's at this very first table. For our presentation tonight we also are going to give you an opportunity to hear about the assumptions and the values that the County Board of Commissioners is using as they revise the plan and these are provided for your information and some context. A summary of those assumptions is included on Page 4 of your pamphlet so you can see those. And you can see the expanded list of assumptions and the values and talk about

those if you would like to ask more questions at Table 2 and Mike Mabrey is at Table 2, he's right there.

When we think about environmental issues we realize there's a lot to consider and so we separate those for convenience sake into concern about the natural environment and issues that concern the built environment, a list of those issues is presented on Page 5 of your pamphlet so you can see those there. Tables 3 and 4, which are the tables back here in this corner, provide maps and other materials that may help you identify some of the issues for both the natural environment and the built environment. And the natural environment is the table with the three maps clustered around it and Colette Anderson who's right now sitting at the welcome table will be handling that table, and Gordon Euler who's standing right here in the brown shirt will be in the back corner and he'll be handling the built environment, so you can go to those two tables, we have a variety of tools and you can ask questions there.

We will take your comments tonight as well as any written comments that you might like to submit later, but we do need comments by October 28th. Someone has already asked me, well, what will you actually do with the comments once you get them. First of all, we will compile them and you'll be able to see them on our Web site, our comprehensive plan Web site, you can see them there, they will be forwarded to the consulting firm that's preparing the EIS, and we have a representative here tonight, Alex Dupey from David Evans & Associates, he'll be helping with the EIS, and once the consultants receive those comments they'll help us in selecting the issues and specific concerns that might be studied in the EIS.

There will be some issues that we hear about year after year so we just know to look at those, you might identify specific geographic areas of concern, you know, I live in this area and I want you to be sure to know that the road floods every single year, so something like that. It can be a comment that specific or it can be a big broader comment, I'm very concerned that if we add new people in this study area, it will be difficult to drive to Portland. It can be a big picture issue or something very specific and small, all those kinds of comments are helpful to us and we will use those comments to select the issues of greatest concern that need to be studied in the EIS.

So tonight there are two ways to comment. You can sit down and talk to Cindy. Cindy is our court reporter right here and you can just sit down and talk to her, you don't have to write out a comment, so you can say whatever it is you need to say by just sitting down and talking to Cindy, that's exactly what she's here for. And so we want to encourage you to do that because quite often it's easier to express ourselves verbally than it is to write something out in longhand and we are hoping that you'll feel more comfortable talking to a real person and we're hoping that you find this a good technique. For talking to Cindy tonight puts your comment in the record just as though it was a written comment. Don't feel as though you have to do it twice, go ahead and use that; however, if that makes you uncomfortable you can always submit a written comment. And if you'll look at the back sheet of your pamphlet you'll find a comment sheet there, you can fill that out, we'll give it to Cindy and she will transcribe it. So either way it's perfectly fine whatever your comfort level is.

So before we break up and give you the opportunity to circulate through the tables if you care to or to talk to Cindy, I'd like to see if there are any questions about our purpose tonight or what will be done with the comments. Do you have any questions? Okay. Great.

PUBLIC: When you're studying in the maximum study area do you grid off the county within that? How do you decide what to study and how to study it?

MARLIA JENKINS: Alex, would you like to respond to that question since you're the one who actually does the work.

ALEX DUPEY: Well --

MARLIA JENKINS: Kind of put you on the spot there.

ALEX DUPEY: Alex Dupey. We use the County's GIS system to evaluate land use and the impacts each alternative on a variety of factors, the environmental land use, population of economy, so it's not broken up by sector per say, they are generally an aggregate number of acres and then we just start, we just determine the impact based on that, like for example number of stream miles added into the study area from the County so we --

PUBLIC: So it ends up being all formulated kind of?

ALEX DUPEY: Not necessarily formulated but it's a degree of impact is what we're looking at because it's problematic. So very specific impacts are less important than what the overall impact of an alternative would be compared to another alternative. Does that help?

PUBLIC: Yes, that helps. Thank you.

MARLIA JENKINS: Okay. Great. Any more questions? All right, then, we'll kind of turn you loose to talk to the staff. Again I want to thank you for coming, we do appreciate your interest and time and enjoy yourselves and talk to Cindy when you have your comment ready. Thank you.

**Steve Douglass, 18008 NE 81st Circle, Vancouver, 98682:** I live in the Fifth Plain Creek area and there's been a proposed development by a developer for somewhere between 2200 and 2600 new homes of various densities and myself and another neighbor are representing all the property owners that surround us in the Monet's Garden neighborhood and we have several concerns.

One is of course is the density of the housing that's proposed. The homes that we live in are on acre lots, the surrounding area is agricultural, are small farms, horses, cows, are homes on large acreage 5, 12 acres of something of that nature. Some of the homes that have been proposed by the developer are five homes per acre in R1-5, R1-6 and some even more dense in other areas, but anyway, those homes would be -- some of them would be adjoining our properties. Now the County Board of Commissioners has talked about having not that much, they talked about having buffer zones between the various densities of homes; however, those are the most dense and they're adjoining ours which are quite a bit less dense and we're concerned about that. Another concern of course is the cost that might be -- we might incur from taxes, levies, bonds and so on that are needed to build the infrastructure. Those things would be the schools, the impact on the schools. I've talked to people on the school board and in the

Evergreen School District and the schools cannot adequately accommodate the kind of growth that would come from that much housing.

Roads are another concern. There's only two roads at each end of that area there where you can access the homes that are in that area and there's a creek that runs through there, there would have to be bridges built, there would have to be additional roadway access, the streets would have to be widened, there's signals that would be needed, a lot of development would need to take place to accommodate that many homes. Police, Sheriff services would be a concern because I know already that the Clark County Sheriff's have the lowest deputy per thousand population of any county in the state. It's approximately, and I forget the exact numbers, but approximately .68 deputies per thousand, when a more normal number would be one deputy per thousand. I'm sure the impact by the fire department, their ability to get into the area in an emergency would be hampered.

Another concern is flooding. There's areas that flood in the wintertime there and if you were to add that many additional homes with the increased paving, homes and everything, there's not as much runoff as -- not as much ability for the land to absorb the water and it would cause increased flooding.

I think the solution really is to develop the commercial and industrial areas to bring in new business, new jobs, expand the tax base and develop the ability to provide with the infrastructure that's needed with the additional housing and then you build the housing. The County has talked about doing that; however, I'm really not seeing it. I don't know how many new businesses come in, I'd be curious to find out, but I think it's a very low number and obviously I don't think it's going to accommodate the number of homes that are proposed.

So that's in a nutshell. I'm concerned about the density of the housing that's coming in and I'm concerned about the impact on the area, and I'm also concerned about the impact on the taxes and levies and bonds and so on that's going to be needed. It's a great idea to provide affordable housing for people, but once they buy the housing and they can't afford the taxes and bonds and levies that are needed to build the infrastructure what's been accomplished, not much in my opinion.

**George Vartanian, 2217 NE 179th Street, Unit 5, Ridgefield, 98642:** In the EIS it would be helpful if there were some indication of how much use and what kind of use critical lands could be put to and will the EIS, it's more of a question, will the EIS show or indicate the transitions from more to less intensive land use. Like in a certain area will it go -- will it show how it's going to go from industrial to commercial to high density residential and then to low density residential so that you don't have a low density residential right next to a factory, that kind of a thing. So if they could put that into the EIS, that would be very nice, helpful.

**Jeanette Steinhauer, 7304 NE 182nd Avenue:** We don't want our property being brought into the urban growth boundary. We're concerned that a developer requested that our property be brought in, included in a 660-acre subdivision, submitted a master plan without our permission our 12 acres along with many of our neighbors that are finally coming forward and saying that this is -- that they never requested it. We're concerned because in his master plan he has designated our creek area, the creek that runs through our property in our woods, to build an eight-foot wide concrete walking path, public walking trail along the length of the creek, so we're very concerned about

that. Our land is there's animals, there's birds, there's Blue Heron, there's coyotes, rabbits, I mean fish in the creek and timber, you know, forest that I think that we're concerned that it needs to remain exactly how it is as habitat.

We're concerned with the flooding that may be caused by the new subdivision. We've experienced some flooding in the past in our field along the creek, especially south of us along Fourth Plain, the area south of Fourth Plain is prone to flooding, we're concerned about that. We're concerned about the road, if the 2600 homes are built we're concerned about the traffic, the schools, emergency services, all of that. We would like to see an alternative to just keep building more and more residential homes. We would like the County to look at alternatives to that and something in commercial or industrial that will provide jobs. Presently our property is designated Residential 5, the land around it is some of it's Ag-20, it's all rural, most of it is farms, there's a chicken farm across the street and of course there's a dairy down the road from us, it's beautiful and it -- we're concerned that the type of subdivision that Hinton Development is proposing is high density and will ruin the habitat. That's it.

*--End of comments from meeting held October 18, 2005--*

**INDEX #2: Comments from: Mike Aspros, 4194 Forest View Drive, Washougal, WA, [mike\\_aspros@yahoo.com](mailto:mike_aspros@yahoo.com) 10/23/2005**

Commentary: I would like the 2004 Comprehensive Growth Management Plan for Washougal to remain in effect. The propose plan increases development, which will lead to more silt and mud into the Washougal River, further destroying a vital Salmon spawning river, which is below all the dams on the Columbia River. We should be taking every step we can to limit the impact of development which would degrade the Washougal River, which is the main asset the community has. In addition, 34<sup>th</sup> Street will not be able to handle more traffic than what it has now. I do not it is in our best interest to increase the urban growth boundary than what was voted in the 2004 Comprehensive Growth Management Plan. The new growth plan is bad for fish, forest and livability of the Washougal area. We should be zoning for high rise condo's in downtown Washougal which would take advantage of views of the Columbia River and Gorge.

**INDEX #3: Comments from Pat Price, 4513 NE 137<sup>th</sup> Street, Vancouver, WA, [ronpat11@comcast.net](mailto:ronpat11@comcast.net) 10/29/2005**

Commentary: This is being submitted on behalf of the Pleasant Highlands Neighborhood Association. We wish to reiterate that our concerns, which have not changed from the past couple of years of the GMP review process, regarding development east of NE 50th Avenue and south of Salmon Creek. We have provided written testimony during 2003 and 2004 as the GMP revisions have moved forward. This information should still be on file in Long Range Planning, including testimony with analysis dated May 5, 2003.

**INDEX #4: Comments from John S. Karpinski, 2612 E. 20<sup>th</sup> Street, Vancouver, WA, 360-690-4500 10/28/2005**

Commentary: Dear Responsible Official: Thank you for the opportunity to comment on your proposal. CCNRC must advise the County that its range of alternatives is based on

an erroneous premise, and is fatally flawed under SEPA as its range of alternatives are essentially “do nothing” or BS Morris’ maximum growth plan. This is not allowed by law. First, the Scoping Notice erroneously assumes that the maximum study area will be based on the “assumptions” and “the policy directions” attached as attachments 1 and 2 to the Scoping Notice. However, past history has shown, these planning assumptions are as pliable as the decision-makers who have drafted them. So, it is unlikely that the planning assumptions that are attached to the Scoping Notice will end up being the final assumptions that are implemented, yet the Scoping and the Alternatives are based on them, a fatal flaw.

Even if this linkage between the assumptions and the alternatives is disconnected, there is still an illegally narrow range of alternatives. The EIS should have the widest range of alternatives, particularly on government non-project proposals. Essentially, the only alternative presented here is the no action alternative and the grow at the BS Morris Growth rate scenarios. Growing at smaller (and/or denser and more affordable and environmentally benign rates), are not included. So should the foreclosure of other options (conversions of farmland, etc) Id. This is a violation of SEPA.

In addition, a delayed action alternative must also be included. WAC197-11-440(5)(c)(vii). DOE’s SEPA Handbook at D-51, 3[3.3.]. This should include delay and monitoring alternative... as long as to the next 5/10 year update. This differs from the no action alternative because it may or may not result in action based on monitoring, and weighs the pros and cons of waiting to see the effectiveness of the 2004 Plan before the start of another Plan. It is not no action, it is no action now. Failure to include this is a legal fatal flaw to the plan. Include it, and it’s clearly the best alternative. Fail to include it, and it’s a legal slam dunk for CCNRC.

Why is a broad range of alternatives necessary? As Robert Settle indicates in his The Washington State Environmental Policy Act The Legal and Policy Analysis, at § 14.01[2] [b]: “Open-minded, imaginative design and consideration of alternative courses of agency action is crucial to SEPA’s ultimate quest – environmentally enlightened government decisionmaking. Unless agencies venture beyond their traditional modes of operation, the mere preparation of impact statements environmentally analyzing customary agency conduct would be little more than costly ritual without practical effect.”

CCNRC hereby requests reasonable alternatives be added, including slower growth alternatives to the Plan, as well as the delay alternative. Thank you for the opportunity to comment on this proposal. Sincerely yours, John S. Karpinski, Attorney for CCNRC.

**INDEX #5: Definition of Alternatives for EIS for Comprehensive Plan Revision dated October 31, 2005. Memorandum from Marty Snell and Marlia Jenkins, to Clark County Board of Commissioners**

In preparation of the Environmental Impact Statement, the county must define meaningful alternatives. After consultation between the consultants employed to prepare the EIS (David Evans and Associates) the Prosecuting Attorney’s Office and staff, the following alternatives are presented for consideration in the EIS. We believe they present a range of options that satisfy the legal requirements while also providing meaningful analysis.

**Alternative A: No Action Alternative**

The no action alternative is the September 2004 Adopted Comprehensive Plan with September 2004 assumptions.

### **Alternative B**

The Board will develop an alternative based on input from property owners, input from the cities, creation of principles and values, discussion of assumptions and staff input. We expect the geography to be the January 04 boundaries, plus lands within the maximum study area, with the new assumptions and values. This alternative will reflect a broad range of factors, including numerous physical and built characteristics of the environment. The project calendar targets selection of the boundary for this alternative by March 2006.

### **Alternative C**

We suggest development of Alternative C based on these basic factors:

- a) Use geography of the requests from cities in June\July 2005 plus urban reserve that may not be captured by these requests.
- b) Use the March 2005 assumptions, principles and values articulated by the Board of Commissioners.
- c) Experience shows that minimizing environmental impact can be a combination of avoidance and selecting zoning categories that have a lesser impact.
- d) The Board indicated that critical areas, road capacity and schools are issues of great concern to this Board and to the community. This conclusion may change because of the scoping for the EIS.

The suggestion is to develop Alternative C by:

- a) Overlaying critical areas onto the city requests plus urban reserve area and choose UGB boundaries\zoning that minimize the impact on high priority critical areas.
- b) Overlaying road capacity\deficiencies onto the city requests plus urban reserve and choose UGB boundaries\zoning that minimize impact on arterial road capacity. A helpful refinement might be to minimize arterial deficiencies between communities. Alternately, the Board might choose to have the comparison focus on deficiencies within UGB's.
- c) Overlaying school district boundaries and choose UGB boundaries\zoning that minimize impact on schools by giving each area commercial or industrial property (increase revenue without population).
- d) Identify Alternative C based on the areas that minimize the greatest impacts between critical areas, roads and schools.

The rationale is:

- a) Concentrate the environmental analysis for the Alternative C on issues of great concern and look for areas where impacts can be reduced.
- b) Use the EIS Alternative C to develop tools that will help the Board in the selection of their alternative.
- c) Be efficient with time and resources.
- d) Maintain the project schedule by proceeding immediately.

The Alternative B will be different from Alternative C because it will consider many other factors in addition to these three and have a different geographic area. The control totals for population, employment, etc. will be the same between the two alternatives.



The total size of each of the maps under discussion is shown below.

Geography	Sept 2004 (Alternative A)	Red line map as of October 20	City Request plus urban reserve (Alternative C as proposed)	Maximum Study Area	Alternative 1-2003
Acreage	88,758	99,400	103,543	108,558	111,558
Sq. miles	139	155	162	170	174

Acreage based on GIS analysis and the final EIS in 2003, as of the date of this memo. Mileage rounded to the nearest mile.

### **Use of Alternative 1 from the 2003 EIS instead of Alternative C**

Staff examined using Alternative 1 from the 2003 EIS instead of creating Alternative C. Alternative 1 is the largest of the 2003 alternatives and therefore the one from the previous plan that might accommodate the new population and employment projections. The advantage of using Alternative 1-2003 is that the analysis of the geography is complete. It could be efficient to apply the new population, employment, and values to this alternative and analyze capacity deficiencies, etc.

The concerns were:

- a) Alternative 1 was defined by staff and the previous Board as an expansion of the 1994 plan and the premise was to expand the geographic areas in a somewhat uniform manner, everywhere.
- b) Alternative 1 has no relationship to the Maximum Study Area defined by the current Board. Some areas are within the MSA and others are outside the MSA. The areas outside might be problematic for inclusion in the EIS review because the Board is considering all new territory for their alternative from acres within the MSA.

Alternative 1 is a feasible choice for the EIS and the considerations do not create overwhelming obstacles. Staff concluded, however, that the Alternative C might give a more useful and consistent look at the potential environmental impacts.

### **Use of Maximum Study Area Instead of Alternative C**

Staff reviewed using the Maximum Study Area (MSA) geography instead of Alternative C geography of city requests plus urban holding. The concern with this approach is that the size of the MSA is quite large and would add more effort to the analysis. Staff concluded it could be more effective to analyze an alternative closer in size to the size needed to serve the population and employment.

Another option is to use the same approach proposed for Alternative C (compare roads, critical areas and schools and reconcile the impacts) on the larger area MSA. This is another viable option, but again incorporates more area to the analysis.

The MSA is a feasible choice for the EIS and the considerations do not create overwhelming obstacles. Staff concluded, however, that Alternative C might give a more useful, focused and consistent look at the potential environmental impacts

### **Staff request:**

Staff requests permission to proceed with development of the EIS using Alternative A: No Action, Alternative B and Alternative C described in this memo.

Staff requests Board direction on refinement of the Alternative C. The Board might instruct consultants and staff to use the criteria they think most represent the Board's values and assumptions. Or, the Board might choose to define the refinements.

**INDEX #6: Comments from Debbie Nelson, Washington Department of Ecology, SW Regional Office, 300 Desmond Driver SE, P.O. Box 47775, Olympia WA 98504-7775, 360-407-6300. 10/28/05**

Commentary: Thank you for the opportunity to comment on the Scoping project for revising the 2004 Comprehensive Growth Management Plan. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s): FLOODPLAINS: Kevin Farrell (360) 407-7253: WAC 365-190-080 describes the topics required for consideration with regard to Growth Management Planning under the "Critical Areas". A consideration of frequently flooded areas is a component that must be addressed. The County should be sure to include, within the EIS, a discussion related to this issue. At a minimum, the County should include, at a minimum, the 100-year floodplain designations of the Federal Emergency Management Agency and the National Flood Insurance Program. The County should also consider the following when designating and classifying frequently flooded areas: a) Effects of flooding on human health and safety, and to public facilities and services; b) Available documentation including federal, state, and local laws, regulations, and programs, local studies and maps, and federal flood insurance programs; c) The future flow floodplain, defined as the channel of the stream and that portion of the adjoining floodplain that is necessary to contain and discharge the base flood flow at build out without any measurable increase in flood heights; d) The potential effects of tsunamis, high tides with strong winds, sea level rise resulting from global climate change, and greater surface runoff caused by increasing impervious surfaces. Ecology's comments are based upon the information provided with the SEPA checklist. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action. If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above. Department of Ecology, Southwest Regional Office (AW: 05-7524)

**INDEX #7: Comments from Gary Albrecht, garycal2@msn.com 10/26/2005**

Commentary: For the EIS scoping, will the total number of acres of residential land remain at 9,461?

Response from Marlia Jenkins 10/26/2005: I hope my answer is on target, if it isn't please try me again. We are scoping the EIS as the area within the Maximum Study Area. That means we are looking at all the land in the area and are trying to identify the concerns. We don't tie the scoping to a particular number of residential or commercial acres. We are using the Board of Commissioner's assumptions, principles and values to create a draft growth alternative. The predicted number of acres we will need to add to the UGA's for growth is 6,277 over the September 2004 adopted plan. Of the 6277, 2413 is residential. The growth alternative is within the Maximum Study Area. We cannot find a reference to the 9,000 + acres so I am not certain what that number represents. If you have a source for it, I can follow up. I hope this helps. If I missed the point, please let me know. Marlia

**INDEX #8: Comments from Bart Phillips, President, Columbia River Economic Development Council, 1101 Broadway, Suite 120, Vancouver WA 98660. 360-694-5006. 10/28/2005**

Commentary: The Columbia River Economic Development Council thanks you for this opportunity to comment on the Scoping Document for the update of the Clark County Comprehensive Plan. We request that the EIS and subsequent planning process address the impact of several of the policy assumptions underlying the plan update. These assumptions all negatively impact the adequacy of the employment land inventory and the County's prospects for economic development.

The Columbia River Economic Development Council is a public/private partnership focused on stimulating job creation and capital investment for the benefit of Clark County citizens. We represent over 180 members including local governments, private sector businesses and the general public interested in building a thriving local economy. Our comments address: 1) the market factor for industrial lands; 2) employment density for industrial lands; 3) industrial land classification; 4) Lack of Consideration for Heavy Industrial Lands; 5) development of critical lands; and, 6) excluding un-developable parcels from the industrial inventory.

**Market Factor for Industrial Lands.** The scope of the EIS should evaluate the impact of reducing the market factor for industrial lands from 50% as in the previous plan to 35% under the current proposal. The intent of the market factor is to ensure the availability of an adequate inventory of industrial lands at a competitive price sufficient to support job creation anticipated by the industrial lands at a competitive price sufficient to support job creation anticipated by the plan. The market factor recognizes: 1) that industrial users are the most price sensitive of all land uses; 2) not all designated property is available for development; and, 3) to provide a variety of parcel sizes and locations for a wide range of industrial uses. The reduction of the industrial market factor negatively impacts all three objectives. The market pressures from residential and commercial uses. Increased SDC's and reduction in inventory have resulted in significant upward price pressure on industrial lands. The reduction in the market factor will exacerbate the situation thereby reducing Clark County's competitiveness for industrial development and job creation.

**Employment Density.** The EIS should consider the impact of the designation of industrial lands as Business Park with its corresponding job density of 20 jobs per acre. It is the position of the CREDC that the BP designation does not correspond to market demand for industrial and office/commercial uses. The past failure of this designation resulted in its elimination from the 1993 plan. Market demands have not changed to the point where this is a viable use designation. As a result, the extensive use of this zone will arbitrarily reduce the inventory necessary to meet the job creation goals of the plan. A better approach is to allow BP uses in ML designation. Further, the CREDC believes that the employment density of 20 jobs per acre is excessive and cannot be supported. A factor of 10 jobs per acre is more appropriate given the mix of uses, landscaping requirements and other performance standards. Use of the proposed factor will over estimate potential job creation from the plan.

**Industrial Land Classifications.** The EIS should consider the impact of the elimination of the three tiered industrial land classification. It is the position of the CREDC that moving to a single tiered system will give an erroneous picture of the quality and quantity of industrial properties and result, over time, in an inadequate inventory of industrial properties. The current three tiered classification recognizes that

not all industrial properties have the same job creation capabilities. Parcel size, infrastructure and critical area factors have a direct connection to job creation. Loss of this information and differentiation will lead to an erroneous picture as to the adequacy of the inventory.

Given the relatively large portion of the inventory impinged by critical areas, the elimination of the tertiary category in the new scheme will lead to an overestimation of the job creation potential of the inventory. We acknowledge that it is difficult to account for these factors in the GIS system and the potential that a tiered system will require manual maintenance of the inventory. The CREDC has assisted the County with tiering the inventory in the past and is willing to supply this support in the future.

**Development of Critical Lands.** The EIS should consider the potential impacts using a conversion factor of 50% for industrial lands with critical areas. While the historical analysis may support this conversion factor, we do not believe that this rate will be achieved going forward for two reasons. First, past industrial development has been focused on parcels with relatively minor critical areas. Undeveloped parcels in the current inventory have the most severe critical area constraints and we expect that the rate of development will drop. Second, the increasing restrictiveness of new Critical Area Ordinances will further reduce the development of industrial parcels with critical areas. As with the previous issues raised above, moving the development factor to 50% will overestimate the inventory of industrial property suitable for job creation.

**Lack of Consideration for heavy Industrial.** The EIS should consider the impact resulting from the lack of designating any expanded area for heavy industrial areas outside the Port of Vancouver and Columbia Business Center. Despite our embrace of the “new” economy there remains a demand for heavy industrial land and uses. Wages in this sector meet county economic development objectives. Not accommodating these uses could impede the region’s development. The current demand for heavy industrial uses are typically niche, high value manufacturing operations with uses and outside yard characteristics that cannot be accommodated in other zoning designations. The also include such uses as building materials manufacturing to support regional construction activities. Not accommodating these uses could retard regional development.

**Inclusion of Non Developable Industrial Lands in Inventory.** The EIS should consider the impact of including non developable industrial lands in the developable inventory. The CREDC has previously identified and forwarded to the County a list of currently designated industrial properties we do not believe can be developed. These properties (such as the Lichtner Landfill and Section 30) remain in the inventory. In our opinion, continuing to include such parcels will result in an overestimation of the developable inventory and negatively impact the ability of the plan to meet its job creation objectives. Thank you in advance for your consideration of the above comments. Sincerely, Bart Phillips, President.

**INDEX #9: Comments from June Puntillo Fricke, 23404 NE Weakley Rd, Camas WA 98607, [twofrickes@hotmail.com](mailto:twofrickes@hotmail.com) 10/27/2005**

Commentary: Please see a letter that several property owners e-mailed in and faxed to the planning commission and city of Camas. We would like to add that a creek runs thru four of the mentioned parcels that feeds Lacamas Lake. If the land were developed the creek waters would not contain animal wastes and not need to be fenced off. We would like to be included into Camas annex. 360-600-5409.

**INDEX #10: Comments from Steven D. Hokett, 18014 NE 85<sup>th</sup> Way, Vancouver, WA, [hokett@comcast.net](mailto:hokett@comcast.net) 10/20/2005**

Commentary: I am quite concerned about Clark County's proposed expansion of the UGB as it affects the Fifth Plain area. First the proposed Fifth Plain Development has not been well-advertised to the current residents; therefore limiting citizen input. The recent Environmental Impact Study meeting for residents of the county is an example. Obvious concerns in the proposed development are reduced Police & Fire service, increased school impacts, flooding, crowded roads, and increased taxes (including levies & bonds). It would also seem very appropriate to develop more commercial land to provide a better tax base to support the growth. Bottom line: I am not in favor of the Fifth Plain development proposal as it now stands. Best regards, Dr. Steven D. Hokett.

**INDEX #11: Comments from Randy Printz, Landerholm Law Firm, P. O. Box 1086, Vancouver, WA, 98666, [randy.printz@landerholm.com](mailto:randy.printz@landerholm.com) 10/28/2005**

Commentary: NE 139<sup>th</sup> Street (Parcel 196178-000). Please consider this property in your EIS scoping area; client is pursuing inclusion in the Urban Growth Boundary and seeks a Comprehensive Plan designation of Urban Low Density Residential with an implementing Zoning designation of Single Family Residential (R1-6).

**INDEX #12: Comments from Sydney Reisbick, P.O. Box 339, Ridgefield WA 98642, [reisbick@earthlink.net](mailto:reisbick@earthlink.net) 10/28/2005**

Commentary: Addendum to previous comment on including effects of buildings and light in the scope of the EIS. When development destroys habitat to make buildings, the resultant buildings continue, longterm, to have an effect on the wildlife that survive the habitat destruction. Thus, the glass and lights associated with buildings have important long-term and cumulative effects on birds. There is also newer information that night-lights have effects on reproduction of some amphibian species. This may be one of the reasons that our frog populations are plummeting. Please include the effects of glass and lights in the scope of the EIS. Thank you, Sydney.

**INDEX #13: Comments from Kevin Snyder, 230 Pioneer Street, P.O. Box 608, Ridgefield, WA 98642, [kevin.snyder@ci.ridgefield.wa.us](mailto:kevin.snyder@ci.ridgefield.wa.us) 10/28/2005**

Commentary: The City of Ridgefield as part of its 2005 update effort to the Ridgefield Comprehensive Plan completed a supplemental environmental impact statement for the City's preferred Urban Growth Area expansion originally submitted to Clark County on June 15, 2005. The City of Ridgefield published the Draft Supplemental Environmental Impact Statement on August 12, 2005. A copy of the Draft Supplemental Environmental Impact Statement was provided to Clark County. The Final Supplemental Environmental Impact Statement was published on September 19, 2005. The City received a total of five (5) written responses to the Draft Supplemental Environmental Impact Statement (DSEIS) following its issuance on August 12, 2005. A consecutive 30-day comment period in conformance with state statute was provided with the expiration of the public comment period occurring at the end of the business day on Monday, September 12, 2005. The City of Ridgefield requests that Clark County as part of its alternatives analysis establish the City's preferred UGA expansion as an alternative to be considered and analyzed. The City of Ridgefield further requests that the analysis and findings of the City's published Supplemental Environmental Impact Statement be incorporated into Clark County's alternatives analysis. Please notify me of your

acceptance of the City's request pertaining to its preferred UGA expansion and the incorporation and use City's published Supplemental Environmental Impact Statement for Clark County's EIS alternatives analysis. I can be contacted at 360.857.5011 or kevin.snyder@ci.ridgefield.wa.us. Sincerely, Kevin H. Snyder, AICP Community Development Director

**INDEX #14: Comments from Mike Spellacy, 12901 NE 176<sup>th</sup> Circle, Battle Ground, 10/13/2005**

Commentary: In looking at the new proposal for the Growth boundary in Battle Ground I notice that the boundary goes right through the middle of my housing development (View Crest Acres). This leads me to ask if this will have any affect on our neighborhood, for example, will half the neighborhood be getting sewer options, will they be on a different water system, and will this possible affect our CC&R's? Why wouldn't either the whole neighborhood be included or excluded?

**INDEX #15: Comments from Lynn Griffith, Executive Director/CEO, C-TRAN, LynnG@c-tran.org 10/28/2005**

Commentary: C-TRAN has reviewed the Clark County Comprehensive Plan Request for Comments on Scope. This letter provides information regarding recent changes in C-TRAN's boundary and service levels since the Comprehensive Plan was adopted in late 2004.

During the past year, C-TRAN has made a number of changes. One of these involved redefining the C-TRAN service and taxing boundary. C-TRAN's new service boundary includes the city of Vancouver and its current urban growth boundary, and the city limits only of Battle Ground, Camas, La Center, Ridgefield, Washougal, and the Town of Yacolt. This service boundary took effect June 1, 2005. The previous county-wide boundary is no longer applicable.

Additionally, in September, voters approved an additional 0.2 percent sales tax for C-TRAN. This additional revenue will be used to implement the Service Preservation Plan which preserves 2004 levels of service as well as restoring service to the cities of La Center, Ridgefield, and the Town of Yacolt. Service to these cities will be provided with smaller vehicles and in a more innovative and cost-effective manner than in previous years. Service design discussions are underway with each city at this time with service implementation anticipated in the first quarter of 2006. The transit assumptions for these cities in the previous Comprehensive Plan will need to be updated.

During the development of the current Comprehensive Plan, C-TRAN was also working on its 20-Year Transit Development Plan, which utilized the Comprehensive Plan as the basis for determining location and needed capacity for future service and facility transit investments. In the coming year, C-TRAN will engage in a system re-design and complete its 20-Year Transit Development Plan. C-TRAN will need to coordinate with the County to ensure current land use plans are factored. As the Comprehensive Plan update proceeds, and urban growth boundary adjustments and assumptions about populations and job growth, density, and location of key activity areas are identified, C-TRAN would be interested in working with the County in identifying how transit can be an effective tool in expanding the transportation system within C-TRAN's service area. Transit can provide an affordable and flexible transportation option for meeting the expected growth in travel demand in the Plan.

We look forward to working with you as the Comprehensive Plan EIS and C-TRAN's planning processes move forward.

Sincerely, C-TRAN, Lynne Griffith, Executive Director/CEO

**INDEX #16: Comments from Karen Wood, 14910 NE 46<sup>th</sup> Street, Vancouver WA 98682, kwood@pacifier.com 10/28/2005**

Commentary: After reading the 11-page document mailed to me and reviewing some information on the long range plan review website, I have some comments on the EIS scoping. 1. The 2% population forecast assumption is too high. It will result in Clark County continuing to be the relief valve for growth in the Portland-Vancouver metropolitan area due to Metro's lower forecast for growth. 2. Market factor seems to be a way to expand the urban growth boundary without being supported by an actual need for more land. The need for market factors needs to be fully explained in the EIS and I think the percentages should be reduced if not eliminated. Market factor seems duplicative of the effort to identify available buildable land and may not be necessary if that identification is accurate. 3. Job creation goals should encourage Clark County residents to work in Clark County, which would improve the tax base and reduce need for commuting to Portland. I'm not sure if 1 new job for each new 1.75 people will achieve this goal. 4. Housing densities should be higher in Battle Ground, Camas, Ridgefield, Washougal, and La Center. If these small cities want to grow in population to the extent they are proposing, they need to do so in densities similar to Vancouver, otherwise, they should not grow. 5. Planning Assumption number 15 under Data-Driven Assumptions discusses excluding critical areas from buildable lands inventory but then states that 50% of the vacant residential and industrial lands will convert and 80% of the vacant commercial lands will convert. This seems contradictory and needs to be clarified. Development should not occur in critical areas, they need to be protected. 6. There is too much development proposed for Ridgefield which would result in a variety of adverse environmental impacts if allowed. 7. Development should not be allowed north of Lacamas Lake. Development on the south side is enough. I probably could have had many of my points above clarified at the 10/18 meeting but was not aware of it. Please ensure that I am notified of future public meetings so I can attend them. I have lived in Clark County for most of my 48 years and plan to live here for the rest of my life. I realize it will grow, but I hope that growth will occur in a manner that preserves our quality of life. I can support a new growth management plan that minimally expands boundaries if that expansion serves the purpose of maintaining open space, fish and wildlife habitat, and other important environmental factors within the urban growth boundary, so our quality of life is not impacted as much. But I can't support expanded boundaries that are meant to benefit developers or a small group of people who feel the need to develop their land. The needs of the majority of people who already live in Clark County should receive priority. We are the people who elected the commissioners to serve us.

**INDEX #17: Comments from David Richardson, Land Use Law Clerk, Friends of the Columbia Gorge, 522 SW Fifth Avenue, Suite 720, Portland OR 97204, 10/21/2005**

Commentary: Friends of the Columbia Gorge has reviewed and would like to comment on the above-referenced Comprehensive Plan. Friends is a non-profit organization with members in approximately 3,000 households dedicated to protecting and enhancing the

resources of the Columbia River Gorge through the effective implementation of the Columbia River Gorge National Scenic Area Act. Our membership includes hundreds of citizens who reside in the six counties within the Columbia River Gorge National Scenic Area.

Please note that the comprehensive plan cannot modify zoning or densities within the Columbia River Gorge National Scenic Area (NSA), nor expand the Washougal Urban Growth Area (UGA) in the NSA. According to the Final Decision and Order of the Western Washington Growth Management Hearing Board in *Achen v. Clark County*, No. 95-2-0067 (1995) (Exhibit A), the Columbia River Gorge Commission alone has the authority to establish zoning and density in the non-urban sections of the National Scenic Area. Exhibit B shows the boundaries of the National Scenic Area within Clark County. Thank you for this opportunity to comment, which preserves our standing. Sincerely, David Richardson, Land Use Law Clerk. Note: Copy of No. 95-2-0067 Final Decision and Order with Exhibit A submitted with letter and available for review.

**INDEX #18: Comments from Mr. Glen Freeman, 2913 “N” Street, Vancouver WA 98663-2838 10/26/2005**

Commentary: Concerning the growth management plan and comments I want to submit for it. I am very unhappy with the direction the corporate developer-backed likes of Betty Sue Morris and Mark Boldt want to sell any remaining open spaces and farmlands out to the highest bidder. As much as I was against the wishy-washy likes of Craig Pridemore and Judy Stanton. This city has become nothing else but soulless as Portland’s biggest suburb. There is no heart nor soul to it. “Growth” has been all about quantity, not quality, we already have lost way too much dairy farms (very few left), open spaces, wetlands, and rural areas for the bottomless greed of these sprawl developers. Yet Betty Sue Morris doesn’t feel like we yet have enough.

We have no community here that’s personable and filled with community centers, arts centers, a thriving downtown, and supportive services. What we have is a car-dependent rat race of every man for himself. Cold and alienating. I am very much against expanding the urban growth boundary further and further outward. To promote the degradation of our landscapes and air and the loss of more and more businesses to the unincorporated areas and suburbs. I favor putting an end to any further growth unless it’s minimal and oriented around downtown. We can’t afford the heavy cost of public money for endless roads, sewer lines, schools, fire and police and other services. Not to mention further traffic congestions. We also need more protected areas for farmland and open spaces. I have been phone and by writing voiced these comments to the County Commissioners. And as can be expected they did not bother getting back. I ask this time to be responded. Sincerely, Glen Freeman, 2913 “N” Street, Vancouver WA 98663.

**INDEX #19: Comments from Don Kemper, Proprietor, Earth-Wind-Fire & Ice Forge, 20100 NW 61<sup>st</sup> Avenue, Ridgefield WA 98642 10/25/2005**

Commentary: The EIS for the 2004 Comprehensive Growth Management Plan did NOT adequately assess the increased development of the Whipple Creek Drainage. The scoping of the EIS presently underway MUST include adequate considerations of the drainage, along with the other growth impacts.

The County is well aware of the impacts, the article “Stream Savers”, in the Columbian, Sunday, March 20, 2005.



I quote said article, "The state Department of Ecology requires new construction to be offset by swales, manmade ponds or other devices designed to capture storm runoff. But the agency acknowledged in a study three years ago that fewer than half of wet lands mitigation projects required by the state were even moderately successful. Construction standards, applied on a project-by-project basis, fail to address the cumulative effect of changing the natural environment."

I have asked before in previous scoping exercises for the EIS in progress do just that, "INCLUDE IN THE STUDY THE CUMMULATIVE IMPACTS OF PROPOSED DEVELOPMENT ON THE SHIPPLE CREEK DRAINAGE!"

The creek formerly contained a thriving Sea Run Cutthroat trout population. This anadromous fishery [termed "threatened" by the U.S. Fish and Wildlife Service and the National Maritime Fisheries Service in 1999, followed by a lawsuit by the U.S.F.&W.S. to uphold the designation should not be ignored in the scoping of the present document. The creek has become inundated by every heavy rain the last few years as development of the amphitheater and housing East of I-5 has increased impervious surface runoff immensely. Steep sided, eroded banks, streamside shade trees undermined and toppled and spawning gravels smothered with silt runoff occur with each heavy rain. While each new ACCUMULATIVE impact is not considered on the creek. The creek HAS become an eroded, steep banked, flash flood prone storm drain. Mitigation of existing overload is needed, as is new development in the drainage.

EITHER CONSIDER ACCUMULATIVE RUNOFF OR DEVELOP CONCRETE SLUICeway DRAINAGE PLANS, reminiscent of Southern California for the lower creek areas.

Clark County has reopened the Habitat Ordinance and the Wetlands Ordinance as it affects private properties, with ever increasing restrictions thereto. But, past growth planning documents have not included a clear assessment of existing and future drainage impacts. Roads and other infrastructure / services have received far better scrutiny. Clark County has an ESP program to satisfy the ESA on Salmon and Steelhead fisheries [also anadromous species]. The Clean Water Programs assessment of Upper Whipple creek curing Spring, 2005 asked for landowners cooperation, with results that Whipple Creek MAY already be beyond its healthy capacity. The impacts are readily available for inclusion in the scoping, as are the future growth impacts easily interpreted and included. Thank you, Don Kemper. Cc's to: Fairgrounds Neighborhood Assc., Clark County Commissioners, Natural Resource Council c/o J. Karpinski, Clark Public Utility Commissioners, The Columbian.

**INDEX #20: Comments from Steve Douglass, 18008 NE 81<sup>st</sup> Circle, Vancouver WA 98682 10/25/2005**

Commentary: Thank you and your staff for the well prepared meeting on 10-18-05 concerning the EIS issues. I was unaware of the meeting until a friend sent me an e-mail message the day before the meeting was scheduled. I am sure there were many others who would like to have attended but were not notified in time.

I have been appointed as a representative for the Monet's Garden subdivision. Prior to the EIS meeting we had circulated a petition concerning the proposed residential development in our area, the 5<sup>th</sup> Plain Creek. Those who signed the petition have the same concerns as those that I expressed at that meeting: Overcrowded roads. Understaffed Fire & Sheriff's services. Crowded schools. Increased flooding in low lying areas. Increases in taxes, bonds and levies.

The low turnout at the meeting does not accurately reflect the concerns of the Community. I am submitting a copy of our petition to be included in your records to show that many of us in this area strongly feel that these issues need to be thoroughly studied before a final decision is made concerning the future growth. Thank you, Steve Douglass, 18008 NE 81<sup>st</sup> Circle, Vancouver WA 98682.

Note: Please consult paper file at DCD for a copy of the petition and 74 signatures.

**INDEX #21: Comments from Wendy Garrett, 19207 NE 73<sup>rd</sup> Street, Vancouver WA 98682 10/24/2005**

Commentary: I am writing to you concerning Environmental Impact Study. I presently live close to the proposed fifth plain development here the Proebstel area. We have 3 creeks that are in the area. Fifth plain, Lacamas and Shanghai Creeks are here. We have an abundant wildlife that lives here because of these pristine creeks. There are many types of birds, frogs, fish, etc. To add 2500+ homes will have a great impact on the wildlife here.

For example the impact of runoff when it rains going into the creeks there is lawn fertilizers, sprays, car oil, and trash that ends up in these creeks. And there is also a concern about high traffic and the air pollution that comes with this.

We live in a beautiful place and it should not be ruined.

Trying to build high density developments here would have such a negative impact on a beautiful area like this. So please examine this plan and carefully screen it. Thanks for your time, Windy Garrett, 19207 NE 73<sup>rd</sup> Street, Vancouver WA 98682.

**INDEX #22: Comments from Tim Trohimovich, AICP, Planning Director, futurewise, 1617 Boylston Avenue, Suite 200, Seattle, WA 98122 10/25/2005**

Commentary: Futurewise (formerly 1000 Friends of Washington) is a statewide public interest group working to promote healthy communities and cities while protecting working farms and forests for this and future generations. We have members in Clark County as we do throughout the State of Washington.

We generally agree with the elements of the environment that the environmental impact statement (EIS) will address. We also have some additional recommendations.

**Impervious Surfaces and Forest Cover.** On page 4 the scoping document describes the effects of impervious surfaces and notes that existing storm water regulations may mitigate those impacts. However, storm water regulations do not address all of the impacts of impervious surfaces.

Research by the University of Washington has shown that when total impervious surfaces exceed five to 10 percent and forest cover declines below 65 percent of the basin, then salmon habitat in streams and rivers is adversely affected. As several University of Washington researchers wrote:

*Results of the PSL stream study have shown that physical, chemical, and biological characteristics of streams change with increasing urbanization in continuous rather than threshold fashion. Although the patterns of change differed among the attributes studied and were more strongly evident for some than for others, physical and biological measures generally changed most rapidly during the initial phase of the urbanization process as % [total impervious area] TIA above the 5-10% range. As urbanization progressed, the rate of degradation of habitat and biologic integrity usually became more constant. There was also direct evidence that altered watershed hydrologic*

*regime was the leading cause for the overall changes observed in instream physical habitat conditions.*

*...The findings of this research indicate that there is a set of necessary, though not by themselves sufficient, conditions required to maintain a high level of stream quality or ecological integrity (physical, chemical, and biological). If maintenance of that level is the goal, then this set of enabling conditions constitutes standards that must be achieved if the goal is to be met. For the PSL streams, imperviousness must be limited (<5-10% TIA), unless mitigated by extensive riparian corridor protection and BMPs. Downstream changes to both the form and function of stream systems appear to be inevitable unless limits are placed on the extent of urban development.*

Professor Derek Booth described how modeling by King County showed that the 65 percent forest retention requirement “just met” the criteria for maintaining stream health. Clearing more than 65 percent of a basin increased flows so that they harmed streams and salmon habitat.

The adverse effects resulting from forest loss and impervious surfaces include “extensive changes in basin hydrologic regime, channel morphologic features, and physio-chemical water quality.” These hydrologic changes include increases in peak runoff and reduced subsurface flows. These then result in higher winter flows, which can blast our stream channels and instream habitat. It also results in lower summer and fall stream flows, which contributes to higher temperatures, low oxygen, and other adverse impacts on salmon habitat. Other studies have reached the same conclusion. For example:

*In a recent review of these studies, Schueler concludes that “this research, conducted in many geographical areas, concentrating on many different variables, and employing widely different methods, has yielded a surprisingly similar conclusion – stream degradation occurs at relatively low levels of imperviousness (10-20%)”. Recent studies also suggest that this threshold applies to wetland health. Hicks found a well-defined inverse relationship between freshwater wetland habitat quality and impervious surface area, with wetlands suffering impairment once the imperviousness of their local drainage basin exceeded 10%.*

Professor Booth of the University of Washington has shown that the impacts, extensive changes in basin hydrologic regime, channel morphologic features, and physio-chemical water quality changes resulting from impervious surfaces and the loss of forest cover are not mitigated by storm water regulations. They can only be effectively mitigated by maintaining impervious surfaces below five to ten percent and retaining forest cover at 65 percent.

Consequently, the draft EIS should discuss these impacts and compare the percentages of impervious surfaces and forest cover in the county’s sub-basins between the alternatives. The EIS for the 2004 Comprehensive Plan included some of this information. Further, maintaining impervious surfaces below five to ten percent and retaining forest cover at 65 percent or less should be included as a mitigating measure.

**Transportation and Capital Facilities.** There are serious questions about whether the county can fund the transportation and capital facilities needed to accommodate any alternative other than the no action alternative. When assessing the impacts of the alternatives on transportation and capital facilities, the EIS should be clear about what facilities are included in the analysis, the costs of the facilities, and how they will be funded. Facilities that cannot realistically be funded should not be included in the analysis.

**Natural Resource Lands.** The scoping document includes the issue of compliance with the Growth Management Act. One of the requirements of the Growth Management Act is to direct urban growth areas away from natural resource lands. The draft EIS should identify and compare the urban growth areas that include agricultural lands, forest lands, and mineral resource lands for each alternative.

**Natural Hazards.** The scoping document includes the issue of compliance with the Growth Management Act. One of the requirements of the Growth Management Act is to direct urban growth areas away from natural hazards. The draft EIS should identify and compare the urban growth areas in flood plains, geological hazards, and other natural hazards for each alternative. Information on natural hazards in Clark County is included in the CAO on CD included with this letter.

**Lack of Public Involvement in the Comprehensive Plan Update Process.** We have serious concerns about the lack of public involvement in the comprehensive plan update process. The Board of County Commissioners has purported to make decisions about the comprehensive but has failed to provide for adequate public involvement. While those who want to expand the urban growth area have been invited to address the Board of County Commissioners, the general public has been frozen out of the process. SEPA also requires public involvement and we encourage you to follow those requirements.

Thank you for the opportunity to comment on the scope of the EIS and considering our comments. If you require additional information please call or e-mail me at (206) 343-0681 or [tim@futurewise.org](mailto:tim@futurewise.org). Sincerely, Tim Trohimovich, AICP, Planning Director.

Note: Please consult the paper file at DCD for attached CD and magazine article, as well as referenced quotes and footnote information.

**INDEX #23: Comments from Laura Hudson, Vancouver Long Range Planning, Vancouver WA 98668, 10/27/2005**

Commentary: Thanks for the opportunity to provide comments on the EIS for the revisited County Comprehensive Plan. We recommend the following, which do not appear to be addressed in the September 26 Request for Comments on Scope letter.

1. **Have the No Action alternative reflect what is most likely to happen if no action is taken *now*, rather than what was thought to occur under a *previous* plan.** To estimate how much growth will occur within existing boundaries without expansion, Clark County's 2005 GIS analyses of VBLM assumptions should be used because they are a much more up-to-date and accurate estimate of what will occur in the future than the assumptions used in the 2004 plan. The new data and assumptions also more accurately reflect information in the Section 215 Plan Monitoring report.
2. **Establish a realistic range of EIS alternatives, not all or nothing extremes.** Include at least one or two alternatives that have larger UGA expansions and growth forecasts than the No Action alternative, but less than the most recent discussion draft proposal of 16 square miles. Based on previous analysis, the new EIS could reveal that expanding 16 square miles would result in higher costs and lower levels of service and greater environmental impacts than is acceptable. Without such a range of alternatives, there would be no good information on the extent to which these concerns would be lessened with a smaller expansion and lower growth forecast.

3. **Don't exclude capital facility maintenance, or non-capital public services from the impact analysis.** Over a 20-year plan the costs of maintaining new schools, roads and utilities, and the costs of paying for new police, fire and other services will probably exceed the costs of new construction. Limiting the analysis to facility construction needs alone won't provide sufficient information to decision makers or the community, and appears inconsistent with SEPA requirements to analyze significant impacts, not just those which are required under GMA. Fortunately a few pieces of this information were collected in the 2003 EIS (number of new police officers needed), some information was presented during hearings last fall (e.g., the Sheriff's estimate of the cost of serving a larger urban area) and city plans and budgets have been updated. Including this information should not prove that difficult, since service providers can generate maintenance and non-capital needs estimates along with their capital projections. Our purpose in raising this issue is not to bog down the EIS with precise detail, but to urge at least approximate consideration of these two major categories of impacts from growth which account for tens of millions of dollars, determine the level of service received and that taxpayers must pay for.
4. **Include actual cost and revenue estimates.** We appreciate Board discussion highlighting public service affordability as a key issue, and support the comment request from statement that fiscal impacts will be looked at in each alternative. We believe this requires developing specific cost and revenue dollar estimates for at least the major services. The 2003 EIS summarized transportation cost information well, and provided information on facility needs for other services from which costs could be easily generated. Revenue estimates could also be generated, as they were in the 2004 County Capital Facilities Summary Report. For projected revenue sources that rely on voter and/or outside approval not yet granted, or are otherwise uncertain, the analysis should indicate the potential impacts if the sources are not realized. In the case of schools, for example, there should be an assessment of the consequences if projected bond levy's fail, such as the number of portable classrooms needed, number of non-portable core facilities needed, etc.
5. **For transportation and public safety, include estimates of level of service, usage and safety impacts facing users, not just the costs to government.** We urge that the EIS estimate the levels of service and vehicle congestion and accident rates that would occur on roads, and the response times for police and fire services. The 2003 EIS addresses transportation usage well in this regard on a countywide basis, but not transportation safety, or police or fire impacts. The information should be readily available from the providers.
6. **Identify spillover impacts to city and service providers operating outside the proposed expansions.** (see WAC 197-11-060(4)(b)). The proposed UGA expansions will probably have significant impacts to adjacent existing areas and jurisdictions that serve them, and these should be identified:
  - a. *Direct spillover impacts to transportation.* RTC's countywide modeling process already allows for identification of additional traffic, level of service, vehicular congestion/delay, necessary facilities and estimated total costs for individual cities, UGAs, and the state road system. To assess the significance of these impacts, there should also be at least a brief assessment of how adjacent jurisdictions and providers will fund necessary improvements.

- b. *Direct spillover impacts to other services.* Similar, less detailed assessments should also be made for impacts to public safety, schools, or other services where significant spillover demand from the expansion areas is likely to occur.
  - c. *Indirect revenue shifting impacts.* (see WAC 191-11-060(4)(d)). For at least transportation, schools and public safety, there should be some assessment of how meeting needs in the expansion areas will effectively impact revenue available from finite local, regional, and state sources to meet needs in existing areas, and how this shift would impact the services provided. This impact may be significant, and needs to be addressed.
7. **Identify major short term impacts. (see WAC 197-11-060(4)(c)).** Plans which mitigate impacts over 20 years may still have potentially significant adverse impacts in the early years if services do not keep pace with growth. For at least transportation, schools and public safety, the EIS should assess likely growth and impacts over the first 6 years, including necessary facilities, costs, and levels of service and usage. This analysis should also address whether any planning tools will be used to phase growth, or whether all new areas will be open to development at the time of adoption, and what the likely impacts are.
8. **Approximately estimate land use impacts of planned growth levels if continued over time.** WAC 197-11-060(4)(d) requires SEPA analysis to address impacts from “the likelihood that the present proposal will serve as a precedent for future action.” A quick GIS analysis can be used to project the size of future boundary expansions necessary if the land consumption rate of the proposed alternatives is continued beyond 20 years. A simple variant of this would be to project when effective urban buildout of Clark County would be reached (excluding likely not-to urbanize areas such as the Vancouver Lowlands, federal lands in the cascade foothills, and areas to be preserved between UGAs). Some form of longer term assessment should be provided to meet this SEPA requirement, and would seem useful given that parties on all sides of the 2004 plan debate called for future consideration of buildout implications.
9. **Additional comments on the natural and built environment**
- a. Impacts to prime agricultural or forest soils from urban or rural center development should be considered, either in the soils section or in a separate section directly addressing impacts to resource lands.
  - b. The fish and wildlife impact analysis should include analysis of whether the proposed expansion will affect the ability of the County and each city to meet the goals of the Lower Columbia Salmon Recovery Plan implementation, including ability to meet the “65/10” rule, through avoidance of development in watersheds having 65% or more canopy, and 10% or less impervious surface.
  - c. The energy impacts analysis should consider the approximate amount and cost of gasoline used for transportation (can be calculated off of VMT), and a general impacts for energy usage to serve new buildings and houses (can be calculated off of projected residential and non-residential units).
  - d. The EIS description of the number and type of jobs and housing units and how these patterns meet County housing and economic development goals (as stated on page 5 of the comment request letter) should also consider how the patterns address Countywide Planning Policies. Approximate housing densities, types, costs and fair share distribution in the alternatives should also be considered.

- e. The transportation analysis as applied to the Vancouver area should include a high-capacity transit loop through Vancouver and across the I-5 and I-205 bridges, as referenced in the Vancouver Comprehensive Plan.
- f. Within the GMA conformance section or elsewhere, short and longer term impacts from the proposed County code change to eliminate the current “5-year” and “75%” requirements for boundary expansions should also be evaluated in the EIS. WAC 197-11-060(3)(b)(iii)(b) states that proposals shall be discussed in the same environmental document if one cannot proceed without the other.

Thank you. As noted, most of the issues raised here were addressed in part in the 2003 EIS or other related documents, and can be addressed in fuller form now without exhaustive new types of analyses. We are recommending an assessment of the full range of significant impacts that will likely impact the community as required by SEPA, not absolute precision in making this assessment. We are available to assist in compiling the information as it pertains to Vancouver. Call if you have any questions or concerns.

**INDEX #24: Comments from Miller Nash LLP Attorneys at Law, Steve Horenstein, LeAnne Bremer, James Howsley, & Meridee Pabst, 500 E. Broadway, Suite 400, Vancouver WA 98660, 10/28/2005**

Commentary: On behalf of our many clients, we are submitting these comments on the scoping notice for the EIS for the update of the 2004 Comprehensive Growth Management Plan.

As an initial matter, we support and join in the comments of the Columbia River Economic Development Council contained in a letter from Bart Phillips to Marlia Jenkins dated October 28, 2005.

Second, while we do not have any objection to the scoping notice itself, it does refer the planning assumptions in Attachment 1 developed by the Board through June 28, 2005.

Because these planning assumptions figure heavily in the development of the comprehensive plan and its environmental impacts, we believe it is important to comment on them. Our specific concerns about the planning assumptions are:

- There is an assumption that 50% of the vacant critical lands designated residential and industrial and 80% of the vacant critical lands designated commercial will convert. These percentages are based on development data between 1996 and 2004. These are extremely high percentages and we do not believe that this will occur on the ground. While these percentages may be based on historical data since 1996, critical areas regulations have become increasingly more restrictive and we expect this to continue. The Army Corps of Engineers regulations, for instance, at one time allowed wetlands fills up to three acres with a nationwide permit. Now the threshold is one-half an acre. And recently the Seattle District has taken the position that wetland fills over one-half an acre for residential properties will not be allowed unless the applicant can demonstrate that there is no alternative for the project anywhere in Clark County. Obviously, this position has severely limited an applicant's ability to develop critical lands even with mitigation. These assumptions would be more realistic if they were based on data from the last several years and a prediction of the effects of upcoming constraints due to updates to habitat, wetland and stormwater control ordinances.

- We agree with CREDC that the plan should not assume a job density of 20 jobs per acre for Business Park. In our experience, the Business Park zone does not spur job growth and certainly not at 20 jobs per acre. Many of our clients have had BP property with little ability to market and sell it.
- We support keeping the primary, secondary and tertiary classification system for industrial lands as a means for determining which lands are more likely to convert during the planning horizon. Tertiary lands, for instance, are less likely to be developed, especially if they are underutilized rather than vacant. Conversion percentages should be different for each classification of industrial lands. The planning assumptions have eliminated this three tier system.

Thank you for the opportunity to comment on the scoping notice. We look forward to working with the County during the update process.

**INDEX #25: Comments from Gretchen Starke, Conservation Chair, Vancouver Audubon Society, 308 NE 124<sup>th</sup> Avenue, Vancouver WA 98684, 10/28/2005**

**Commentary:** The mission of the Audubon Society and all its chapters across the nation, including the Vancouver Audubon Society, is to conserve wildlife and preserve habitat. Our particular focus is on birds. Birds are found in all types of habitat in North America. Because growth and development can harm and destroy habitat, we are concerned about the direction the update of the county's comprehensive plan might take. We hope that the environmental impact statement (EIS) the county prepares for this update is thorough and accurately assesses the environmental impacts of accelerated growth.

**Context for Comprehensive Planning** - Although I suspect that commenting on the justification of changing the county's comprehensive plan, a plan that is only one year old, is not what is requested in the comments on scoping, I will do so anyway. The only meaningful change that has occurred in the year since the current comprehensive plan was adopted is the change in composition of the board of commissioners.

**Alternatives** -- The county apparently will analyze only two alternatives: the No Action Alternative and the Develop Almost the Entire County Alternative. The statement in the call for comments on scoping implies that the eventual preferred alternative will be somewhere in-between, but will be leaning toward the Develop the County Alternative. We have two objections to this approach.

If the county is to do a thorough and adequate job in preparing this EIS, it is essential that more than two alternatives be analyzed. The county should take a close look at all potential alternatives from doing nothing to developing everything to many alternatives in between. We also suggest that the county should analyze an alternative that would have a lower growth rate and smaller urban growth areas than are in the present plan. All these analyses should appear in the EIS. With a thorough analysis of all potential alternatives, the public and the county should be able to determine which is the best alternative to go with.

It is premature to select a preferred alternative, even tentatively. An EIS is supposed to be a decision-making document, not a justification document. The process of preparing an EIS should drive the decision, rather than the decision driving the preparation of the EIS. In the process of analyzing a full range of alternatives, it should become clear which alternative would have the least impact on the natural environment, which would be the least costly to the taxpayers of the county, which would be least detrimental to



the provision of county services and which would be the best, overall, for the citizens of the county.

**Elements of the Environment** -- The following categories are listed under the Fish and Wildlife Habitat element: habitat, sensitive, threatened and endangered species, migratory species and migration routes and wetlands. We suggest a fifth category: indicator species. Each indicator species would be a representative species of a habitat type found in Clark County. A given habitat could have more than one indicator species. Species that are, at the present time, common should be included as indicator species. We want to keep species that are common, common. Examples of avian indicator species could include the following: 1) dead and standing trees, downy woodpeckers and black-capped chickadees; 2) mixed conifer and hardwood forests, spotted towhees; 3) wetlands/riparian areas, belted kingfishers and great blue herons; 4) mature Douglas fir forests, pileated woodpeckers; and 5) fields/meadows, killdeer and western meadowlarks (not many of those left in Clark County, outside of wildlife refuges). In addition, I will mention a report prepared by Audubon Washington, State of the Birds. This study, conducted by the biologist, Tim Cullinen, in the Audubon Washington's state office, was done by analyzing databases from various scientific and non-profit organizations and government agencies. In addition, peer-reviewed publications were analyzed and experts were interviewed. From these analyses and interviews, the status of the species of birds that spend at least some of their life history in Washington was determined. Among the birds that the study found to be vulnerable are willow flycatcher, chipping sparrow, MacGillivray's warbler, rufous hummingbird, Vaux's swift, and pileated woodpecker. These birds are (or were) found in Clark County and should be included in the analysis.

Thank you for the opportunity to comment on the scoping process. We hope the result will be a thorough analysis of the various alternatives to be considered in updating the county's comprehensive plan. Sincerely, Gretchen Starke, Conservation Chair, Vancouver Audubon

**INDEX #26: Comments from Landerholm, Memovich, Lansverk & Whitesides, P.S. Attorneys at Law, Randall Printz, 805 Broadway, Suite 1000, Vancouver WA 98666, 10/27/2005**

Commentary: (Addressed to Marty Snell) On behalf of Hinton Development Corporation, we are submitting Fifth Plain Creek Master Plan. Please accept these comments on the Environmental Impact Statement (EIS) that is to be completed for the 2004 Comprehensive Growth Management Plan revision. We understand that comments on the scope of this EIS must be received by October 28, 2005.

We are submitting this information in order to express our continued interest in the Fifth Plain Creek Master Plan and its consideration for inclusion in the UGB. The Board of Clark County Commissioners has initiated a review of elements of the Comprehensive Growth Management Plan adopted in September 2004, the pace and character of recent development, and the amount of land available for homes and businesses. These discussions will help the commissioners determine the scope and direction of possible changes in urban growth boundaries to adjust the supply of buildable land.

This proposal helps outline why the Fifth Plain Creek Master Planned area, contiguous area comprised of many parcels, represents a well designed community that can adequately serve the growing population of Clark County. The conceptual plan has

been designed to maintain the natural resource corridors and elements in the area, while also avoiding the pitfalls of parcel by parcel development.

We ask that the County include the Fifth Plain Master Plan area in its scoping of the environmental impact statement (EIS) on the proposed Comprehensive Growth Management Plan revision. Very truly yours, Randall B. Printz

Revised submittal Item for Fifth Plain Creek Master Plan: (Addressed to Board of Clark County Commissioners) On behalf of Hinton Development Corporation, we are submitting a revised Master Plan for your review and comment. As you are aware, on June 7<sup>th</sup> of this year, we submitted an application requesting that Fifth Plain Creek be considered for Urban Growth Boundary inclusion.

Since that time, Hinton has reduced the boundaries of the Master Plan area and updated all relative portions of the proposal, including the narrative, traffic analysis, utility analysis, and updated list of property owners. Please accept these five copies and update your records to reflect the revised Master Plan. Very truly yours, Randall B. Printz

Note: Consult paper file at DCD for the complete Fifth Plain Master Plan, October 28, 2005 revision.

**INDEX #27: Comments from John Coop, 20313 NE 10<sup>th</sup> Avenue, Ridgefield WA 98642, 10/26/2005**

Commentary: This letter will convey my requests in reference to Clark County's Revised Comprehensive Plan and Environmental Impact Statement scoping. Specifically, I would like Clark County to: 1) include my property within the proposed Urban Growth Area (UGA), 2) provide clarification of which UGA the property is proposed to be part of, and 3) assign commercial or industrial zoning to the property when it is included in the UGA. My property is located at 20313 NE 10<sup>th</sup> Avenue, Ridgefield, Washington, and consists of two contiguous Clark County tax parcels (179152-000 and 179191-000) totaling approximately 45 acres.

My requests are in regard to the revised Clark County Comprehensive Growth Management Plan Draft Discussion Map dated September 27, 2005, which I recently received. The map shows my property as being within the New Industrial Urban Reserve Overlay area lying just north of the current City of Vancouver UGA. (Please see the attached copy of the Comprehensive Growth Management Plan Draft Discussion Map.)

1) I am pleased that you have added my property to the New Urban Reserve Overlay area; however, my preference is to have my property included in the actual UGA to allow for industrial/commercial development on the property in the shorter term. The property is characterized by several attributes which, I believe, make it particularly suitable for this type of development. These characteristics are as follows:

- Access: The current access point for the subject property is located on NE 10<sup>th</sup> Avenue, approximately 1,000 feet north of NE 199<sup>th</sup> Street. A proposed second access point to the property would be from NE 199<sup>th</sup> Street, approximately 2,500 feet east of NE 10<sup>th</sup> Avenue.
- Proximity to I-5: The current access to I-5 is approximately 1.5 miles south of the property at I-5 and NE 179<sup>th</sup> Street via NE 10<sup>th</sup> Avenue and would provide appropriate and convenient industrial and commercial access to I-5 until the new interchange at I-5 and NE 219<sup>th</sup> Street is complete. Via NE 10<sup>th</sup> Avenue and NE

219<sup>th</sup> Street, the property is less than a mile south of the new interchange. This route would become the preferred access to I-5 upon completion of the project. The interchange project is in the final planning stages with construction scheduled to begin in early 2007.

- Adjacent Land Uses: Properties abutting my property are zoned R-10 and R-5. Nearby properties located south of NE 199<sup>th</sup> Street, within the City of Vancouver UGA and Clark County draft discussion line, are zoned Light Industrial (ML). (Please see attached zoning map.) The zoning change requested in this letter and subsequent future industrial use of the property would integrate well with those adjacent land uses.

2) The map places my property just north of the proposed draft discussion UGA line for the City of Vancouver and designates the property with a New Industrial Urban Reserve Overlay. Though the property and New Industrial Reserve Overlay abut – or are close to the City of Vancouver’s UGA – it is not made explicitly clear whether the overlay area is to be within the UGA of the City of Vancouver or the City of Ridgefield. I would like to clarify this point, although at this time I have no reason to object in either case.

3) In addition to inclusion within the UGA and clarification, I would also like to request a change in the zoning of my property from the current Rural-10 (R-10) designation to a Commercial, light Industrial or similar designation to allow for the short-term commercial/industrial development of the site. The reasons for this proposed change are summarized above.

I believe that the proposed inclusion into the UGA and change in zoning are appropriate for the site and conform with adjacent current and future land uses.

Thank you for the opportunity to submit this request as well as for your time and consideration. If you have any questions or would like to discuss my request, please contact me at work: (360) 887-0485 or (360) 256-7463, mobile (360) 600-5299, email: [jcoop58@comcast.net](mailto:jcoop58@comcast.net). Home address: 20313 NE 10<sup>th</sup> Avenue, Ridgefield, WA 98642. Sincerely, John Coop. cc: Clark County Board of County Commissioners; Marlia Jenkins, Program Development Manager.

Note: Please consult the Paper file at DCD for the attached maps.

**INDEX #28: Comments from Landerholm, Memovich, Lansverk & Whitesides, P.S. Attorneys at Law, David J. Ward, 805 Broadway, Suite 1000, Vancouver WA 98666, 10/28/2005**

Commentary: Please be advised that our firm represents Birchwood Farms, LLC, owners of property located at 18600 NE 50<sup>th</sup> Avenue. This property has a Comprehensive Plan designation of Urban Reserve (UR) with an implementing zoning designation of Agriculture-20-acre minimums (AG-20). The 76.99 acre parcel, also known as Tax Lots 29, 33, and 145, Serial No. 181571-000, is located in Section 12, Township 3 North, Range 1 East, Willamette Meridian, Clark County, Washington.

The purpose of this letter is to request the property be included in the Vancouver Urban Growth Boundary and that the Comprehensive Plan designation be changed to Urban Low Density Residential with an implementing Zoning designation of Single Family Residential (R1-10). We have been advised by Long Range Planning Staff that we need to submit the materials in support of this request for inclusion within the UGB to ensure consideration during this current Comprehensive Planning cycle. Further, we are aware that the County is currently accepting comments on the scoping of the Environmental

Impact Statement to be performed on the UGA expansion. Please accept this letter as both a request for inclusion as well as comments on the scope of the EIS.

The property is north of NE 179<sup>th</sup> Street along the western side of NE 50<sup>th</sup> Avenue. Properties to the North and East have a Comprehensive Plan designation of Urban Reserve and an Urban Reserve – 10 acre minimum (UR-10) zoning designations. Properties to the West and North are designated Urban Reserve with an UR-10 zoning designation. Properties directly south of the site are also zoned Agriculture with the Urban Reserve comp plan designation. Many of the surrounding parcels are developed as single-family residential.

As noted above, the property carries the Urban Reserve Comprehensive Plan designation. The property and the surrounding area, including the area north to NE 199<sup>th</sup> Street, are currently included within the proposed boundaries of the Draft Discussion Map. This mapping process, as well as the Urban Reserve designation, acknowledges that this property and some of the area surrounding it are appropriate for inclusion into the UGB.

The applicable criteria for this Comprehensive Plan amendment and rezone are set forth in CCC 40.560. The following discussion analyzes how the proposal furthers the goals and policies of the “20-Year Comprehensive Plan for Clark County,” the Growth Management Act and other requirements of Clark County. This request is made pursuant to Clark County Code Section 40.560 (Amendments Docket), and we ask that consideration of this request be included in the docket process for the current comprehensive planning cycle.

**A. Growth Management Act (GMA)** The proposal complies with several of the goals of the Growth Management Act, including:

- \*Goal One “Urban Growth”

- \*Goal Three “Transportation”

- \* Goal Four “Housing”

The proposal will provide for urban levels of future development in an area where public facilities are either currently available or can be provided in an efficient manner, meeting Goal One of the GMA. A sewer and water feasibility has been prepared by Olson Engineering, Inc. and is attached with this letter. Olson has determined that sewer and water are not currently available to the site. However, both can be extended to serve the site. In addition, Hazel Dell Sewer District is currently planning to add this vicinity to their service area. HDSD is actively planning for urban levels of development in this area at this time. Copies of the current version of their sewer plans are attached along with the Olson analysis. There are some infrastructure challenges in this area; however, we believe that future development in the area can either contribute to the cost of this infrastructure, or perhaps even extend the utilities at the developer’s cost.

Because of its northerly location, this property will utilize the transportation system at NE 179<sup>th</sup> Street and avoid NE 134<sup>th</sup> Street. The 134<sup>th</sup> Street corridor is currently congested and has been the subject of a recent development moratorium. Improvements to NE 179<sup>th</sup> Street have been made to accommodate traffic associated with the Clark County Amphitheater. These improvements have created additional transportation capacity for growth in this area.

In addition to the current capacity, further improvements to 179<sup>th</sup> Street are currently anticipated in the County’s Transportation Improvement Plan.

## **B. Clark County Code (CCC) 40.560.010(G)**

**1. CCC 40.560.010(G)(1):** The proponent shall demonstrate that the proposed amendment is consistent with the Growth Management Act and requirements, the county wide planning policies, the community framework plan, twenty (20) year plan, city comprehensive plans, applicable capital facilities plans and official population growth forecasts.

As noted above, the proposal furthers many of the specific goals of the Growth Management Act by: providing for urban levels of development where adequate public facilities exist or can efficiently be extended to serve the site; providing excellent transportation systems in place; and, providing residential development and economical housing options.

Following are some of the Clark County Comprehensive Plan 2003-2023 Community Framework Plan and Comprehensive Plan Policies that support the proposed amendment:

### **2. Framework Plan Policies.**

*2.1.2 Provide housing opportunities close to places of employment.* Inclusion of this property will provide low density residential lands in close proximity to the Vancouver, Ridgefield, and Battle Ground UGAs, which all include employment centers.

*2.1.8 Housing strategies are to be coordinated with availability of public facilities and services, including human services.* As noted above, there are infrastructure issues that will need to be resolved prior to development on this property; however, given the size of the parcel involved, we believe these issues can be resolved in a cost effective manner. The property is near NE 179<sup>th</sup> Street which has access to I-5.

*4.1.0 New developments are to protect and enhance sensitive areas and respect natural constraints.* According to Clark County GIS Mapping, there is a general area associated with the larger Mill Creek watershed, running north and south through the site that has geological hazard indicators, mapped wetlands, and riparian habitat. This area makes up less than 1/6<sup>th</sup> of the entire property; the remaining portions of the site show few environmental constraints making it ideal for urban development. Any critical areas will be protected through the development review process once the property is brought within the UGA.

### **3. County-wide Planning Policies**

*1.1.2 Urban growth areas shall include areas and densities sufficient to permit the urban growth that is projected to occur in Clark County for the succeeding 20-year period.* Current vacant buildable lands analyses suggest additional land for residential opportunities is necessary to accommodate the County's future growth. The Board of County Commissioners recently adopted new population growth assumptions that will require the expansion of the UGA. Inclusion of this area will accommodate that additional growth.

*1.2.2 The UGAs shall be consistent with the following more specific criteria:*

- *Each UGA shall provide sufficient urban land to accommodate future population/employment projections through the designated planning period.* Again, the new population growth assumptions dictate that additional residential lands are necessary to accommodate the higher growth rate.
- *Lands included within UGAs shall either be already characterized by urban growth or adjacent to such lands.* This entire area currently has the Urban Reserve overlay.

The area was considered for inclusion in the 2004 plan, but ultimately was not included in the UGB.

- *Land within the UGA shall not contain areas designated for long-term agriculture or forestry resource use.* This property is zoned Agriculture (AG-20) with the Urban Reserve overlay. However, long term agriculture is no longer viable on this site. We intend to work in conjunction with other property owners in the area to formulate and present a study demonstrating that this area is no longer feasible for agricultural uses.

*6.0.2 Plans for providing public facilities and services shall be planned so that service provision maximized efficiency and cost effectiveness and ensures concurrency.*

*6.0.15 Plans for providing public utility services shall be coordinated with plans for designation of urban growth areas, rural uses, and for the transition of undeveloped land to urban uses.*

These Policies are all furthered by the GMA planning currently underway. As noted above, HDSD is currently planning for urban growth in this area. This process will ensure that any development on the property will be compatible with the surrounding area and efficiently served with urban services. The parcel is zoned Urban Reserve, thus adding residential housing to this area would be consistent with the surrounding area.

Because of its proximity to the UGB, the future availability of water, sewer and transportation capacity the inclusion of this property within the UGB furthers these goals of the Comprehensive Plan.

#### **4. Urban Low Density Residential and R1-10 Characteristics:**

Urban Low Density Residential: "This designation provides for predominantly single-family residential development with densities of between five and 10 units per gross acre. Minimum densities will assure that new development will occur in a manner which maximizes the efficiency of public services. New development shall provide for connection to public sewer and water. Duplex and attached single-family homes, through in-fill provisions or approval of a Planned Unit Development may be permitted." Based upon the goals and policies of the Comprehensive Plan and County's growth patterns over the last several years, this property should be designated as Low Density Residential. The Land Use Element of the County's Comprehensive Plan requires that all planning should be in the parks and civic facilities essential to the daily life of the residents. The subject site would provide several of those elements if it were to be zoned residential.

The goals of the Plan encourage more efficient uses of the site that would allow the creation of additional residential housing to serve the surrounding developing area. The property is compatible with the contemplated land uses in the vicinity.

#### **5. Map Amendment Criteria:**

**a. CCC 40.560.010(G)(2): The proponent shall demonstrate that the designation is in conformance with the appropriate locational criteria identified in the plan.**

The proposal meets the locational criteria cited in the Plan. The property is currently zoned Agriculture with comprehensive plan designation of UR-10. "Areas designated as Urban Reserve are intended for future urban residential and commercial development..." "These areas are identified as being future additions to the Urban Growth Areas." (Comprehensive Plan, page 1-14.) Further, the site is located within an

area that has the full range of public services available and is adjacent to existing low density residential lands.

**b. CCC 40.560.010(G)(3): The map amendment or site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity.**

Due to the property's UR designation and proximity to the Urban Growth Boundary, the site is suitable for the proposed designation. The residential land is necessary to accommodate the County's projected twenty-year population. The population assumptions recently adopted by the Board of County Commissioners dictate that additional residential lands will be needed. This site is well situated and urban services are available.

**c. CCC 40.560.010(G)(4): The plan map amendment either: a) responds to a substantial change in conditions applicable to the area within which the subject property lies; b) better implements applicable comprehensive plan policies than the current map designation; or c) corrects an obvious mapping error.**

The proposed plan amendment better implements applicable comprehensive plan policies because it will utilize this land rather than simply retaining it for future development. The Residential designation recognizes the sites ability to provide for future housing needs of the surrounding neighborhoods.

**d. CCC 40.560.010(G)(5): Where applicable, the proponent shall demonstrate that the full range of urban public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection and schools. Adequacy of services applies only to the specific change site.**

The proposal is to redesignate the site from Urban Reserve to Low Density Residential. At this time the site is not within the City of Vancouver's Urban Growth Boundary and the approval of the amendment would require the extension of public services to serve the site as referenced in the Feasibility Study prepared by Olson Engineering, Inc. Storm drainage remains to be addressed, which will happen at the time of development approval. Development of this site for residential purposes would pay Traffic and School impact fees.

### **C. Rezone Criteria**

The proponent must also comply with the requirements of CCC 40.560.020 (Changes, Amendments to Districts) in order to be granted a request for Rezone that accompanies the Comprehensive Plan Amendment application. Following is a brief discussion of proposal's compliance with the cited code section. CCC 40.560.020(H) sets specific criteria that must be met in order to approve a zone change as follows.

**1. CCC 40.560.020(H)(a): Requested rezone is consistent with the Comprehensive Plan designation.** For purposes of this section the Applicant will analyze the property as if the Comprehensive Plan designation is changed to Urban Low Density Residential. The current Agriculture designation would not support a rezone to R1-10. The requested rezone would ensure compliance with the amended Low Density Residential designation.

**2. CCC 40.560.020(H)(2): The request zone change is consistent with the plan policies and locational criteria, and the purpose statement of the zoning district.** The requested zone change is consistent with the locational criteria and purpose statement of the zoning district. The R1-10 zone is designed to accommodate low

density residential development. This area is currently surrounded by low density residential development, thus this proposal will ensure consistency and compatibility with the surrounding area.

**3. CCC 40.560.020(H)(3): Except for industrial designation, conditions have substantially changed since the zone was applied to the property and the rezone furthers public health, safety, morals, or welfare.** Since the initial zoning designation in 1994, substantial development has occurred throughout the County. This has resulted in level of service issues, particularly transportation related, in many areas within the Urban Growth Boundary. The zoning was not changed in the 2003-2023 plan. The designation of the site as Low Density Residential would respond to the surrounding growth in residential development west and south of the site as well as the increased population growth assumption recently adopted by the Board.

**4. CCC 40.560.020(H)(4): There are adequate public facilities and services to serve the request zone change.** This criteria and how the proposal complies is discussed in the Comprehensive Plan Amendment portion of this document. There will be some impact to public facilities. Impacts to public services would be addressed by paying impact fees and system development charges through the development review process.

As demonstrated throughout this document, the Comprehensive Plan Amendment and Rezone requested further the goals and policies of the County's Comprehensive Plan (both current and past), and complies with the applicable zoning ordinance locational criteria and purpose statements, capital facility elements and population forecasts.

We have entered into preliminary discussions with Renaissance Homes, who controls the property to the south. We believe that Renaissance will likely be the developer of this site. If this is the case, then utilities can be extended from the south through their property. As you may be aware, Renaissance builds high quality homes that will benefit this area and the economy of the County in general.

Please contact me if you have any questions related to this proposal. Very truly yours,  
David J. Ward. Cc; Birchwood Farms LLC

Note: Please see the paper file at DCD for maps attached to the letter.

*--End of Indexed Comments Received via e-mail, letter, and hand-delivery--*